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COUNTY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JULIA MILDENBERGER, in her
individual capacity and in her capacity
as CEO of SOUTHERN
CALIFORNIA CAT ADOPTION
TAILS; a California nonprofit
corporation,

Plaintiff/Petitioner,

vs.

COUNTY OF LOS ANGELES; and
DOES 1 through 50, inclusive

Defendants/Respondents.

Case No. _____

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant County of Los Angeles hereby
removes to the United States District Court, Central District of California the state
court action described below.

1. On December 1, 2022, an action was commenced in the County of Los
Angeles Superior Court, titled *Julia Mildenberger, etc. v. County of Los Angeles, et*
al., Los Angeles Superior Court No.22STCP02424. A copy of the petition in such

1 case is attached in the separate exhibits volumes as Exhibit A.

2 2. Despite being labelled as a petition, the Petition includes a cause of
3 action for damages under 42 U.S.C. § 1983, premised on alleged violations of the
4 United States Constitution.

5 3. The first receipt of such document was by the purported service on the
6 County of Los Angeles was made on December 6, 2022. Attached as Exhibits D
7 and I, respectively, in the separate exhibit volumes, are true and correct copies of the
8 Summons and of the Proof of Service filed with the Superior Court.

9 4. On December 8, 2022, the petitioner filed a First Amended Complaint,
10 a copy of which is attached as Exhibit L in the separate exhibit volumes.

11 5. On December 9, 2022, plaintiff made service by mail of such document
12 on counsel for the County of Los Angeles. A copy of the proof of service is attached
13 as Exhibit M in the separate exhibits volumes.

14 6. As of the date of the filing of this removal, no defendant has been
15 named in place of any Doe.

16 7. This action is a civil action of which this Court has original jurisdiction
17 under 28 U.S.C. § 1331 and is one which may be removed to this Court by the
18 defendants pursuant to the provisions of 28 U.S.C. § 1441 (b) and (c), in that it
19 involves claims for violations of 42 U.S.C. § 1983.

20 DATED: January 5, 2023 CARPENTER, ROTHANS & DUMONT LLP

21 /s/ John J. Stumreiter

22 By: _____

Jill Williams

John J. Stumreiter

23 Attorneys for Defendant/Respondent

24 COUNTY OF LOS ANGELES